

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

No. 3:24-CR- 31

v. :

(Judge *Munley*)

ROBERT M. REYNOLDS, :
Defendant :

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
18 U.S.C. § 1343
(Wire Fraud)

FILED
WILKES BARRE
FEB 14 2024
PER *[Signature]*
DEPUTY CLERK

I. Introduction

At times material to the Indictment:

1. Defendant ROBERT M. REYNOLDS was a resident of Newfoundland, Pennsylvania, within the Middle District of Pennsylvania.
2. The United States government has taken steps to slow the spread of the coronavirus (COVID-19) pandemic, and to mitigate its impact on the public's health and economic well-being. On March 13, 2020, the President declared the ongoing COVID-19 pandemic an

emergency under Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

3. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law. The CARES Act created the Pandemic Unemployment Assistance (PUA) program, which provided unemployment benefits to individuals not eligible for regular unemployment compensation or extended unemployment benefits.

4. The PUA program was administered by the various states, including the Commonwealth of Pennsylvania, but its benefits were funded in part by the federal government. In Pennsylvania, the Pennsylvania Department of Labor & Industry (PA Dept. of L&I), headquartered in Harrisburg, Pennsylvania, within the Middle District of Pennsylvania, administered the PUA program.

5. A PUA claim must be submitted online through the PUA website maintained by the PA Dept. of L&I. The applicant must enter personal identification information, including name, date of birth, social security number, email address, telephone number, and a physical address. An applicant also must answer a series of questions that

enabled the PA Dept. of L&I to determine the applicant's eligibility and payment amount.

6. An applicant was only eligible to receive PUA benefits if he or she was unemployed for reasons related to the COVID-19 pandemic, and was available to work. The applicant must certify, under penalty of perjury, that he or she was able to go to work each day and, if offered a job, the applicant must be able to accept it. An applicant must read and understand the PUA Compensation Handbook, which stated that any earnings must be reported for each week a person works.

7. If the PA Dept. of L&I approved an application for PUA benefits, the benefits recipient received funds in the form of checks, electronic fund transfers, or debit cards. To combat fraud in the PUA program, beginning in June 2020, PUA benefits were issued via prepaid U.S. Bank Visa debit cards and mailed via the U.S. Postal Service to the residential addresses on the PUA applications.

8. The recipient of the PUA benefits received a unique Personal Identification Number to access the PUA internet portal to certify his or her unemployment status on a weekly basis. Payments for PUA were

based on a seven-day period, from Sunday through Saturday. Thus, in order to continue receiving PUA benefits after the initial application, the recipient must certify every seven days that he or she: (A) was ready, willing and able to work each day; (B) was seeking full time employment; (C) did not refuse any job offers or referrals; and (D) had reported any employment during the week and the gross pay or other payments received. The weekly certification was required to be completed in a timely manner. A delay in the weekly certification could result in a delay or denial of further payments.

II. Manner and Means of the Scheme to Defraud

9. It was part of the scheme and artifice to defraud that, on or about May 17, 2020, ROBERT M. REYNOLDS submitted and caused another to submit, by means of the internet and interstate wires, a fraudulent application for PUA benefits for ROBERT M. REYNOLDS to the PA Dept. of L&I. The application contained material false statements, including by stating that ROBERT M. REYNOLDS was unemployed because of the COVID-19 pandemic, had earnings for each

quarter of 2019, and that he was available to accept employment if offered a job, when in fact, he was retired.

10. It was further a part of the scheme and artifice to defraud that between in or about May 2020 and in or about August 2021, ROBERT M. REYNOLDS submitted and caused another to submit, by means of the internet and interstate wires, weekly PUA certifications for ROBERT M. REYNOLDS to the PA Dept. of L&I. The PUA certifications contained material false statements, including by stating that ROBERT M. REYNOLDS remained unemployed because of the COVID-19 pandemic, and was available to accept employment, when in fact, he was retired.

11. It was further a part of the scheme and artifice to defraud that between in or about May 2020 and in or about August 2021, ROBERT M. REYNOLDS obtained approximately \$36,000 in PUA benefits, through fraudulent misrepresentations.

III. Statutory Allegation

12. From on or about May 17, 2020, through on or about August 30, 2021, in Wayne County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

ROBERT M. REYNOLDS,

aiding and abetting another, with the intent to defraud, knowingly devised and intended to devise the above-described scheme and artifice to defraud, and to obtain money and property, and attempted to do so, by means of materially false and fraudulent pretenses, representations, and promises.

13. For the purpose of executing, advancing, furthering, and carrying out the above-described scheme and artifice to defraud, the defendant knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, the following writing, sign, signal, picture, and sound:

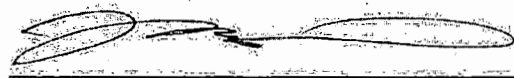
Approximate Date of Wire	Description
May 17, 2020	A fraudulent PUA application for ROBERT M. REYNOLDS submitted by the internet and interstate wires to the PA Dept. of L&I

In violation of Title 18, United States Code, Sections 1343 and 2.

GERARD M. KARAM
United States Attorney

Date: 2/13/24

By:



PHILLIP J. CARABALLO
Assistant United States Attorney